VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA

JOHN C. DEPP, II *Plaintiff,* v. AMBER LAURA HEARD, *Defendant.*	:	Civil Action No.: CL-2019-0002911

PLAINTIFF JOHN C. DEPP, II'S RESPONSES AND OBJECTIONS TO DEFENDANT AMBER LAURA HEAR'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS

Pursuant to Rule 4:9 of the Rules of the Supreme Court of Virginia, Plaintiff John C. Depp, II, by and through his undersigned counsel, hereby responds and objects to Defendant Amber Laura Heard's First Request for Production of Documents and Things (each, a "Request" and collectively, the "Requests"), dated July 30, 2019 and served in the above captioned action ("Action") as follows:

GENERAL OBJECTIONS

1. These General Objections are incorporated into each specific response to the numbered Requests below as if fully repeated therein and are intended, and shall be deemed, to be in addition to any specific objection included in any response below. The assertion of the same, similar, or additional objections or partial responses to the individual Requests does not waive any of Plaintiff's General Objections. Failure to make a specific reference to any General Objection is not a waiver of any General Objection.

2. Plaintiff objects to each and every Request to the extent that the Requests (including the "Definitions" and "Instructions" identified in the Requests) (a) are overly broad or unduly burdensome; (b) are vague, ambiguous, duplicative, cumulative, or do not identify with reasonable particularity the information sought; (c) call for information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence; (d) seek to impose obligations on Plaintiff beyond or inconsistent with those required by Virginia law and the rules of this Court ("Rules"); or (e) purport to seek documents or information not in Plaintiff's actual possession, custody, or control; any statement herein that Plaintiff will produce documents responsive to a specific Request means that Plaintiff will produce documents located through a reasonable search for documents in its possession, custody, and control.

3. Plaintiff objects to the extent that the discovery sought by the Requests is obtainable from some other source that is more convenient, less burdensome, or less expensive.

4. Plaintiff objects to the extent the discovery sought is unduly burdensome or expensive, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the issues at stake in the litigation.

5. Plaintiff objects to each and every Request, Definition, and Instruction to the extent that they purport to require production of documents at a specified time or place, or in a specified manner. Plaintiff will make documents available in accordance with Rule 4:9 and any agreement among the parties or orders of the Court governing the conduct of discovery.

6. Plaintiff objects to the Requests to the extent that they seek documents or information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, protection, exemption or immunity. Plaintiff will produce only non-privileged information. Inadvertent disclosure of any privileged or otherwise protected

documents or information shall not constitute a waiver of any claim of privilege, protection, exemption or immunity. Plaintiff reserves the right to redact documents produced in response to the Requests.

7. Plaintiff objects to the Requests, including the Definitions and Instructions contained therein, to the extent they seek documents or information protected from disclosure as being a trade secret or other confidential business or proprietary information, or documents or information that, if produced or disclosed, would result in the violation of any contractual obligation to third parties.

8. Plaintiff objects to any Request seeking "all" documents on the grounds that Plaintiff cannot guarantee that he has located every single document responsive to a particular Request. Subject to the general objections and any qualifications below, Plaintiff will respond to any Request seeking "all" documents by producing the responsive, non-privileged documents within its possession, custody, and control that can be located after a reasonable search conducted in good faith.

9. Plaintiff reserves the right to produce documents responsive to the Requests on a rolling basis at a time, place, and manner to be agreed on by the parties.

10. Plaintiff objects to the Requests, including the Definitions and Instructions contained therein, to the extent that they are redundant or duplicative of other specific Requests. Where information or a document may be responsive to more than one Request, Plaintiff will provide that information or produce that document only once.

11. Plaintiff objects to the Requests to the extent that they purport to require the identification and/or restoration of any deleted, legacy, backup, or archival data, or otherwise

seek the production of any document that is not accessible without undue burden or unreasonable expense.

12. Plaintiff's responses to the Requests are not intended to be, nor shall be deemed, an admission of matters stated, implied, or assumed by any or all of the Requests. In responding to the Requests, Plaintiff neither waives nor intends to waive, but expressly reserves, any and all objections as to the authenticity, relevance, competency, materiality, or admissibility at trial or during any proceeding of any information or documents produced, set forth, or referred to herein.

13. Any response by Plaintiff stating that it will produce documents is not intended as a representation that such documents exist within any requested category or categories but solely as an assertion that Plaintiff will produce (consistent with these Responses and Objections) any non-privileged, responsive documents or information within its actual possession, custody, or control that can be located after a reasonable search conducted in good faith.

14. Plaintiff objects to any factual assumptions, implications, and explicit or implicit characterizations of facts, events, circumstances, or issues in the Requests. Plaintiff's responses herein are not intended to mean that Plaintiff agrees with any factual assumptions, implications, or any explicit or implicit characterization of facts, events, circumstances, or issues in the Requests, and are without prejudice to Plaintiff's right to dispute facts and legal conclusions assumed in the Requests.

15. These objections and responses are based on Plaintiff's present knowledge, information, and belief, and therefore remain subject to change or modification based on further discovery of facts or circumstances that may come to Plaintiff's attention. Plaintiff reserves the right to rely on any facts, documents, evidence, or other contentions that may develop or come to its attention at a later time and to supplement or amend the responses at any time prior to the

trial. Plaintiff further reserves the right to raise any additional objections deemed necessary or appropriate in light of any further review.

OBJECTIONS TO INSTRUCTIONS AND DEFINITIONS

Instructions

1. In accordance with the Rules of this Court, you shall serve a written response and produce the requested documents at the law office of CAMERON/McEVOY, PLLC, 4100 Monument Corner Drive, Suite 420, Fairfax, Virginia 22030, c/o Sean Patrick Roche, Esq.

> **RESPONSE:** Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires production of documents at a specific time and place. Plaintiff will produce documents at a time and manner on a schedule to be negotiated by the parties.

2. Unless the context clearly indicates otherwise, use of the words "you" or "your" refer to the recipient(s) of these discovery requests (as further detailed in the "Definitions" section below), as well as all persons and entities over which said recipient has "control" as understood by the Rules of this Court.

> **RESPONSE:** No objection.

3. These Requests are continuing in character, so as to require you to promptly amend or supplement your answers if you obtain further or different information. If at any time after compliance with these Requests you should acquire possession, custody, or control of any additional documents within the scope of these Requests you must furnish such documents to the law office of CAMERON/McEVOY, PLLC, 4100 Monument Corner Drive, Suite 420, Fairfax, Virginia 22030, c/o Sean Patrick Roche, Esq., within ten (10) days of their receipt.

> **RESPONSE:** Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires production of documents within a certain period of time following receipt. Plaintiff will produce documents at a time and manner on a schedule to be negotiated by the parties.

4. Where knowledge or information in the possession of a party is requested, such request includes knowledge of the party's agent(s), employee(s), and representative(s), including but not limited to non-privileged information known to your attorneys and accountants.

RESPONSE: Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires production of documents from individuals not under Plaintiff's control. Plaintiff will produce documents from a limited number of custodians to be negotiated with Defendant in good faith.

5. Whenever appropriate in these Requests, the singular form of a word shall be interpreted as its plural to whatever extent is necessary to bring within the scope of these Requests for Production any information which might otherwise be construed to be outside their scope.

RESPONSE: No objection.

6. Unless otherwise indicated, these Requests refer to the time, place, and circumstances of the occurrences mentioned or complained of in the pleadings in this case.

RESPONSE: No objection.

7. All references to an entity include the entity and its agents, officers, employees, representatives, subsidiaries, divisions, successors, predecessors, assigns, parents, affiliates, and unless privileged, its attorneys and accountants.

RESPONSE: Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires production of documents from individuals not under Plaintiff's control. Plaintiff will produce documents from a limited number of custodians to be negotiated with Defendant in good faith.

8. If you perceive any ambiguities in a question, instruction, definition, or other aspect of these discovery requests, set forth the matter deemed ambiguous and the construction used in answering.

RESPONSE: No objection.

9. If you state a claim of privilege as to any of your responses to the Requests for Production, state the basis for the privilege, specify the privilege claimed, and include in your answer sufficient information to permit the Court to make an informed ruling on the claim of privilege. If the claim relates to a privileged document, state the date, person or persons who prepared or participated in preparing the document, the name and address of any person to whom the document was shown or sent, the general subject matter of the document, the present or last known location and custodian of the original of the document, and the basis for the claim of privilege with respect to the document. If the claim of privilege relates to a communication, state the date(s), place(s) and person(s) involved in the communication, the subject matter of the communication, and the basis for the claim of privilege with respect to that communication. Reliance on any claim of privilege is subject to the Rules of this Court, including the production of a privileged log.

RESPONSE: Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires Plaintiff to produce a privilege log in a specific manner at a specific time. Plaintiff will produce a privilege log at a time and in a manner to be negotiated with Defendant in good faith.

10. If you perceive any discovery request to be overly broad, unduly burdensome, or objectionable for any other reason, respond to the fullest extent possible and clearly note any objection so that the Court will be permitted to make an informed ruling on the objection.

RESPONSE: No objection.

Definitions

a ***Communication.*** The term "communication" means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise); it includes all conversations, discussions, letter, telegrams, memoranda, electronic mail, and any other transmission of information in any form, either oral, written, or electronic.

RESPONSE: No objection.

b ***Document.*** The term "document" is defined in its broadest terms currently recognized. The term shall include, without limitations: any written or other compilation of information (whether printed, handwritten, recorded, or encoded, produced, reproduced, or reproducible by any other process), drafts (revisions or finals), original or preliminary notes, and summaries of other documents, communications of any type (inter-agency/inter-company, intra-agency/intra-company), computer tape, computer files, and electronic mail (e-mail) including all of their contents and attached files. The term "document" shall also include but not be limited to: correspondence, memoranda, contractual documents, specifications, drawings, photographs, images, aperture cards, notices of revisions, test reports, inspection reports, evaluations, technical reports, schedules, agreements, reports, studies, analyses, projections, forecasts, summaries, records of conversations or interviews, minutes or records of conferences or meetings, manuals, handbooks, brochures, pamphlets, advertisements, circulars, press releases, financial statements, calendars, diaries, trip reports, etc. A draft of a non-identical copy is a separate document within the meaning of this term.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, and to the extent that it seeks to impose burdens beyond what are required by the Rules.

c ***Correspondence.*** The term "correspondence" means any document(s) and/or communication(s) sent to or received from another entity and/or person.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, to the extent that it is duplicative of the terms Document and Communication, and to the extent that it seeks to impose burdens beyond what are required by the Rules.

d ***Identify (with respect to persons).*** When referring to a person, to "identify" means to give, to the extent known, the person's full name, present or last known

business address and telephone number and when referring to a natural person, additionally, the present or last known home address and telephone number. Once a person has been identified in accordance with this definition, only the name of that person need be listed in response to subsequent discovery requesting the identification of that person.

RESPONSE: No objection.

e ***Identify (with respect to documents).*** When referring to documents, to "identify" means to give, to the extent known, the (i) type and title of document; (ii) general subject matter; (iii) date of the document; and (iv) author(s), addressee(s), and recipient(s).

RESPONSE: No objection.

f ***Person.*** The term "person" is defined as any natural person, business, company, partnership, legal entity, governmental entity, and/or association.

RESPONSE: No objection.

g ***Concerning.*** The term "concerning" means relating to, referring to, describing, evidencing, or constituting.

RESPONSE: No objection.

h ***Including.*** The term "including" means including but not limited to.

RESPONSE: No objection.

i ***And/or.*** The use of "and/or" shall be interpreted in every instance both conjunctively and disjunctively in order to bring within the scope of these discovery requests any information which might otherwise be construed to be outside their scope.

RESPONSE: No objection.

j ***Defendant and/or Ms. Heard.*** The terms "Defendant" and/or "Ms. Heard" refer to Defendant Amber Laura Heard, including her agents, representatives, employees, assigns, and unless privileged, her attorneys and accountants.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, to the extent that it is inclusive of "agents, representatives, employees, assigns, and unless privileged, her attorneys and accountants."

k ***Plaintiff and/or Mr. Depp.*** The terms "Plaintiff" and/or "Mr. Depp" refer to Plaintiff John C. Depp, II, including his agents, representatives, employees, assigns, and unless privileged, his attorneys and accountants.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, to the extent that it is inclusive of "agents, representatives, employees, assigns, and unless privileged, his attorneys and accountants."

l ***Complaint.*** The term "Complaint" shall mean the Complaint filed by Plaintiff in this matter, currently pending before this Court.

RESPONSE: No objection.

m ***Declaration.*** The term "Declaration" shall mean the Declaration filed by Plaintiff in this matter as Exhibit 1 to Plaintiff's Opposition to the Motion to Dismiss.

RESPONSE: No objection.

n ***Romantic Partners.*** The term "Romantic Partners" shall mean any persons you have touched in a sexual manner in the past ten (10) years, meaning: (a) direct contact between any part of your body and another person's genitalia, anus, groin, breast, inner thigh, or buttocks; or (b) direct contact between any part of a third party's body and your genitalia, anus, groin, breast, inner thigh, or buttocks.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, vague and ambiguous to the extent it seeks to impose burdens beyond those required by the Rules. This term is overly broad in its ten year scope, and vague and ambiguous in its use of the terms "direct contact" and

"sexual manner." Plaintiff further objects to this term to the extent that it is inflammatory and harassing, assumes facts not in evidence, lacks foundation, calls for a medical and/or legal conclusion and seeks information unrelated to this case and that is unlikely to lead to the discovery of admissible evidence. Plaintiff will agree to meet and confer with Defendant regarding this term.

o ***You and/or Your.*** The terms "You" and/or "Your" refer to the recipient(s) of these discovery requests, as well as all persons and entities over which said recipient has "control" as understood by the Rules of this Court.

RESPONSE: No objection.

REQUESTS FOR PRODUCTION

1. All DOCUMENTS and COMMUNICATIONS from March of 2016 to present relating to the preparation of a declaration, affidavit, or other statement regarding MS. HEARD, regardless of whether or not a declaration, affidavit, or other statement was actually executed.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

2. All DOCUMENTS and COMMUNICATIONS discussing or relating to any statements or comments YOU have made about your marriage with MS. HEARD from 2016 to present, including DOCUMENTS, communications, comments or statements given to news media, tabloids, celebrity publications, gossip publications, and social media.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff also objects to this Request as vague and ambiguous to the extent that it uses the terms "tabloids, celebrity publications, gossip publications, and social media" because Defendants did not define these terms or provide a list of media outlets.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

3. All DOCUMENTS and COMMUNICATIONS between YOU and any person employed by YOU or working on your behalf pertaining to any acts of violence, or attempted acts of violence, by YOU or MS. HEARD.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff also objects to this Request as vague and ambiguous to the extent that it uses the phrase "attempted acts of violence" without defining it. Plaintiff further objects to this request to the extent it seeks production of documents outside of Plaintiff's custody or control. Plaintiff further objects to this Request to the extent that it is intended to harass Plaintiff, and constitutes an invasion of privacy.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

4. All DOCUMENTS and COMMUNICATIONS between YOU and any person employed by YOU or working on your behalf pertaining to the use of narcotics by YOU or MS. HEARD from 2013 to present.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, to the extent that it seeks documents and communications from 2013 to the present. Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Request on the grounds that it is intended to harass Plaintiff, and constitutes an invasion of privacy.

In light of the foregoing objections, Plaintiff will not be producing documents in response to this Request.

5. All DOCUMENTS and COMMUNICATIONS pertaining to any treatment for alcohol or drug use or abuse by YOU or MS. HEARD from 2013 to present.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, to the extent that it seeks documents and communications from 2013 to the present. Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Request on the grounds that it is intended to

harass Plaintiff, and constitutes and invasion of privacy. Plaintiff further objects to this Request to the extent it calls for confidential personal, business, financial, medical or other proprietary information protected by law, including information that may be protected by the physician-patient privilege and/or the Privacy Rule or the Health Insurance Portability and Accountability Act of 1996 ("HIPPA"). Plaintiff further objects on the ground that this Request calls for a medical and/or legal conclusion.

In light of the foregoing objections, Plaintiff will not be producing documents in response to this Request.

6. All DOCUMENTS and COMMUNICATIONS between YOU and any person employed by YOU or working on your behalf pertaining to YOUR travel between May 20, 2014 and May 26, 2014.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Mr. Depp further objects to this Request to the extent it seeks documents neither relevant to the subject matter of this litigation nor calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

7. All DOCUMENTS and COMMUNICATIONS between YOU and any person employed by YOU or working on your behalf pertaining to YOU or MS. HEARD in Australia during March of 2015.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Mr. Depp further objects to this Request to the extent it seeks documents neither relevant to the subject matter of this litigation nor calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

8. All non-privileged DOCUMENTS and COMMUNICATIONS pertaining to MS.HEARD or YOUR relationship with MS. HEARD created, edited, sent, or received between May 15, 2016 and June 30, 2016.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

9. All DOCUMENTS and COMMUNICATIONS supporting YOUR contention that "The op-ed's clear implication that Mr. Depp is a domestic abuser," as alleged in paragraph 3 of YOUR complaint.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

10. All DOCUMENTS and COMMUNICATIONS supporting YOUR contention that "Ms. Heard's false implication prejudiced Mr. Depp in his career as a film actor and incalculably (and immediately) damaged his reputation as a public figure," as alleged in paragraph 4 of YOUR COMPLAINT.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

11. All DOCUMENTS and COMMUNICATIONS related to your termination as the character "Captain Jack Sparrow" in the Pirates of the Caribbean movie franchise.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent it seeks production of documents outside of Plaintiff's possession, custody or control.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

12. All DOCUMENTS and COMMUNICATIONS related to any other acting roles which were not provided to YOU, or which were rescinded, as a result of the op-ed in question.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent it seeks production of documents outside of Plaintiff's possession, custody or control.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

13. All "security video footage" from the Eastern Columbia Building from 2013 to 2016, as referenced in paragraph 51 of YOUR COMPLAINT.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome. Plaintiff further objects to this Request to the extent it requires the production of documents outside of Plaintiff's possession, custody or control.

Subject to and without waiving the foregoing objections, Plaintiff will produce all security video footage from the Eastern Columbia Building from 2013 to 2016 in his possession, custody or control.

14. The "surveillance video" described in paragraph 54 of YOUR COMPLAINT.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome. Plaintiff further objects to this Request to the extent it requires the production of documents outside of Plaintiff's possession, custody or control.

Subject to and without waiving the foregoing objections, Plaintiff will produce all security video footage described in paragraph 54 of the complaint.

15. Any security or surveillance video from YOUR residence on Sweetzer Avenue in Los Angeles, California from 2013 to 2016.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent it requires the production of documents outside of Plaintiff's possession, custody or control.

.In light of the foregoing objections, Plaintiff will not be producing documents in response to this Request.

16. All DOCUMENTS and COMMUNICATIONS exchanged sent, received, transmitted, or otherwise exchanged between YOU and any "Eastern Columbia Building personnel" from 2013 to 2016, as referenced in paragraph 15 of YOUR COMPLAINT.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

17. DOCUMENTS sufficient to show payments made to "Mr. Depp's security team," as referenced in paragraph 16 of YOUR COMPLAINT from 2012 to present.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request and that refer or relate to the claims and

defenses in this case, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

18. DOCUMENTS sufficient to show payments YOU or anyone acting on your behalf made to Samantha McMillen from 2015 to present.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request and that refer or relate to the claims and defenses in this case, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

19. DOCUMENTS sufficient to show payments YOU or anyone acting on your behalf made to any firm or entity that provides services related to social media (including Twitter, Instagram, and Facebook) from 2015 to present, not including for services solely related to marketing films.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request and that refer or relate to the claims and defenses in this case, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

20. DOCUMENTS sufficient to show payments YOU or anyone acting on your behalf made to any firm or entity that provides services related to print, television, newspaper, magazine or other traditional media from 2015 to present, not including for services solely related to marketing films.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request and that refer or relate to the claims and defenses in this case, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

21. DOCUMENTS sufficient to show payments made to any employee working on Little Halls Pond Cay from 2014 to 2016 and in 2019.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or

protection. Plaintiff further objects to this Request because it seeks information unlikely to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request and that refer or relate to the claims and defenses in this case, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

22. All "newly obtained surveillance camera videos, depositions, and other evidence that conclusively disprove Ms. Heard's false allegations," as described in paragraph 17 of YOUR COMPLAINT.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection.

Subject to and without waiving the foregoing objections, Plaintiff will produce the newly obtained surveillance camera videos, depositions, and other evidence described in paragraph 17 of the Complaint, to the extent that such materials are not subject to any confidentiality or protective orders and are within Plaintiff's possession, custody, or control.

23. All DOCUMENTS and COMMUNICATIONS supporting YOUR contention that "Seattle-based prosecutor declined to press charges against Ms. Heard, but only because both she and her domestic abuse victim were California residents who were merely passing through Washington state," as alleged in paragraph 25, of YOUR COMPLAINT.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the

extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

24. All DOCUMENTS and COMMUNICATIONS supporting YOUR contention that "Ms. Heard committed multiple acts of domestic violence against Mr. Depp during their marriage," as alleged in paragraph 27 of YOUR COMPLAINT.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

25. All DOCUMENTS and COMMUNICATIONS supporting YOUR contention that "building personnel testified under oath that they again facilitated Elon Musk's nighttime visits to Mr. Depp's penthouse to visit Ms. Heard, key-fobbing him in and out of the building proximate to the time Ms. Heard presented her battered face to the public and the court on May 27, 2016," as alleged in paragraph 34 of YOUR COMPLAINT.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-

client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

26. All DOCUMENTS and COMMUNICATIONS pertaining to YOUR contention that "Isaac Baruch[] gave a declaration that he repeatedly interacted with Ms. Heard, at close range, without makeup, and utterly unmarked and uninjured in the days between May 22 and May 27, 2016," as alleged in paragraph 36 of YOUR COMPLAINT.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection.

Subject to and without waiving the foregoing objections, Plaintiff will produce the declaration of Isaac Baruch.

27. All DOCUMENTS and COMMUNICATIONS pertaining to YOUR contention that "[Cornelius] Harrell testified under oath that, on May 22, 2016, Ms. Heard did not have any bruises, cuts, scratches, or swelling on her face and that "nothing appeared out of the ordinary about Ms. Heard's face on May 22, 2016," as alleged in paragraph 43 of YOUR COMPLAINT.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-

client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection.

Subject to and without waiving the foregoing objections, Plaintiff will produce a transcript of Mr. Harrell's testimony, to the extent that it is not subject to any confidentiality or protective orders.

28. All DOCUMENTS and COMMUNICATIONS pertaining to YOUR contention that "Alejandro Romero testified under oath about two specific face-to-face interactions that he had with Ms. Heard in the days after she claimed that Mr. Depp hit her in the face and struck her cheek and eye with a cell phone that he threw," as alleged in paragraph 44 of YOUR COMPLAINT.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection.

Subject to and without waiving the foregoing objections, Plaintiff will produce a transcript of Mr. Romero's testimony, to the extent that it is not subject to any confidentiality or protective orders.

29. All DOCUMENTS and COMMUNICATIONS pertaining to YOUR contention that "Ms. Esparza, who does not know Mr. Depp personally, testified under oath that she thought that Ms. Heard's allegation that she had been assaulted by Mr. Depp was 'false' because 'I saw her several times [in the days after the alleged attack] and I didn't see that [mark] on her face,'" as alleged in paragraph 48 of YOUR COMPLAINT.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-

client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection.

Subject to and without waiving the foregoing objections, Plaintiff will produce a transcript of Mr. Esparza's testimony, to the extent that it is not subject to any confidentiality or protective orders.

30. DOCUMENTS and COMMUNICATIONS exchanged between YOU and Chrissy Depp that mention MS. HEARD or any of YOUR other ROMANTIC PARTNERS from 2010 to April, 2019.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, to the extent that it seeks documents and communications from 2010 to the present. Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request to the extent that it seeks documents outside of his possession, custody or control.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request concerning Defendant and that refer or relate to the claims and defenses in this case, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties. Plaintiff does not intend to produce documents in response to this Request related to any Romantic Partner other than Defendant.

31. DOCUMENTS and COMMUNICATIONS exchanged between YOU and Nathan Holmes that mention MS. HEARD or any of YOUR other ROMANTIC PARTNERS from 2010 to April, 2019.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, to the extent that it seeks documents and communications from 2010 to the present, and to the extent that it seeks documents and communications regarding "any" "romantic partners." Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request to the extent that it seeks documents outside of his possession, custody or control.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request concerning Defendant and that refer or relate to the claims and defenses in this case, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties. Plaintiff does not intend to produce documents in response to this Request related to any Romantic Partner other than Defendant.

32. DOCUMENTS and COMMUNICATIONS exchanged between YOU and Steven Deuters that mention MS. HEARD or any of YOUR other ROMANTIC PARTNERS from 2010 to April, 2019.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, to the extent that it seeks documents and communications from 2010 to the present and to the extent that it seeks documents and communications regarding "any" "romantic partners." Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Request to the extent it is intended to harass

Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request to the extent that it seeks documents outside of his possession, custody or control.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request concerning Defendant and that refer or relate to the claims and defenses in this case, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties. Plaintiff does not intend to produce documents in response to this Request related to any Romantic Partner other than Defendant.

33. DOCUMENTS and COMMUNICATIONS exchanged between YOU and Christi Dembrowski that mention MS. HEARD or any of YOUR other ROMANTIC PARTNERS from 2010 to April, 2019.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, to the extent that it seeks documents and communications from 2010 to the present and to the extent that it seeks documents and communications regarding "any" "romantic partners." Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request to the extent that it seeks documents outside of his possession, custody or control.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request concerning Defendant and that refer or relate to the claims and defenses in this case, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

34. DOCUMENTS and COMMUNICATIONS exchanged between YOU and Kevin Murphy that mention MS. HEARD or any of YOUR other ROMANTIC PARTNERS from 2010 to April, 2019.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, to the extent that it seeks documents and communications from 2010 to the present and to the extent that it seeks documents and communications regarding "any" "romantic partners." Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request to the extent that it seeks documents outside of his possession, custody or control.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request concerning Defendant and that refer or relate to the claims and defenses in this case, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties. Plaintiff does not intend to produce documents in response to this Request related to any Romantic Partner other than Defendant.

35. DOCUMENTS and COMMUNICATIONS exchanged between YOU and Jerry Judge that mention MS. HEARD or any of YOUR other ROMANTIC PARTNERS from 2010 to April, 2019.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, to the extent that it seeks documents and communications from 2010 to the present and to the extent that it seeks documents and communications regarding "any" "romantic partners." Plaintiff

further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request to the extent that it seeks documents outside of his possession, custody or control.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request concerning Defendant and that refer or relate to the claims and defenses in this case, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties. Plaintiff does not intend to produce documents in response to this Request related to any Romantic Partner other than Defendant.

36. DOCUMENTS and COMMUNICATIONS exchanged between YOU and Sean Bett that mention MS. HEARD or any of YOUR other ROMANTIC PARTNERS from 2010 to present.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, to the extent that it seeks documents and communications from 2010 to the present and to the extent that it seeks documents and communications regarding "any" "romantic partners." Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request to the extent that it seeks documents outside of his possession, custody or control.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request concerning Defendant and that refer or relate to

the claims and defenses in this case, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties. Plaintiff does not intend to produce documents in response to this Request related to any Romantic Partner other than Defendant.

37. DOCUMENTS and COMMUNICATIONS exchanged between YOU and Malcolm Connolly that mention MS. HEARD or any of YOUR other ROMANTIC PARTNERS from 2010 to present.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, to the extent that it seeks documents and communications from 2010 to the present and to the extent that it seeks documents and communications regarding "any" "romantic partners." Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request to the extent that it seeks documents outside of his possession, custody or control.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request concerning Defendant and that refer or relate to the claims and defenses in this case, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties. Plaintiff does not intend to produce documents in response to this Request related to any Romantic Partner other than Defendant.

38. DOCUMENTS and COMMUNICATIONS exchanged between YOU or anyone acting on YOUR behalf and Dr. David Kipper that mention MS. HEARD or any of YOUR other ROMANTIC PARTNERS from 2010 to present.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, to the extent that it seeks documents and communications from 2010 to the present and to the extent that it seeks documents and communications regarding "any" "romantic partners." Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request to the extent that it seeks documents outside of his possession, custody or control. Plaintiff further objects to this Request to the extent it calls for confidential, personal, business, financial, medical or other proprietary information protected by law, including information that may be protected by the physician-patient privilege and/or the Privacy Rule of the Health Insurance Portability and Accountability Act of 1996 ("HIPPA"). Plaintiff further objects on the grounds that this Request calls for a medical and/or legal conclusion.

In light of the foregoing objections, Plaintiff will not be producing documents in response to this Request.

39. DOCUMENTS and COMMUNICATIONS exchanged between YOU or anyone acting on YOUR behalf and Debbi Lloyd that mention MS. HEARD or any of YOUR other ROMANTIC PARTNERS from 2010 to present.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, to the extent that it seeks documents and communications from 2010 to the present and to the extent that it seeks documents and communications regarding "any" "romantic partners." Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and

that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request to the extent that it seeks documents outside of his possession, custody or control.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request concerning Defendant and that refer or relate to the claims and defenses in this case, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties. Plaintiff does not intend to produce documents in response to this Request related to any Romantic Partner other than Defendant.

40. DOCUMENTS sufficient to show any payments made by YOU or anyone acting on YOUR behalf to any hotel, rental house, apartment, suite, AirBnB, or any other lodgings for any damage done.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, to the extent that it seeks documents and communications beyond any relevant time period. Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request concerning Defendant and that refer or relate to the claims and defenses in this case, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

41. DOCUMENTS sufficient to show each time YOU were arrested and the reason(s) for the arrest.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, to the extent that it seeks documents and communications beyond any relevant time period. Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy.

In light of the foregoing objections, Plaintiff will not be producing documents in response to this Request.

42. All written agreements (marital agreements, separation agreements, property agreements, settlement agreements, confidentiality agreements, non-disclosure agreements, and/or protective order agreements) between YOU and any former ROMANTIC PARTNERS.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, to the extent that it seeks documents and communications beyond any relevant time period. Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request to the extent it seeks production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request concerning Defendant and that refer or relate to the claims and defenses in this case, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties. Plaintiff does not intend to produce documents in response to this Request related to any Romantic Partner other than Defendant.

43. All DOCUMENTS and COMMUNICATIONS pertaining to the "3 surgeries to reconstruct my finger," as referenced in paragraph 12 of YOUR DECLARATION.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request to the extent it calls for confidential, personal, business, financial, medical or other proprietary information protected by law, including information that may be protected by the physician-patient privilege and/or the Privacy Rule of the Health Insurance Portability and Accountability Act of 1996 ("HIPPA"). Plaintiff further objects on the grounds that this Request calls for a medical and/or legal conclusion.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request that refer or relate to the claims and defenses in this case, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

44. All DOCUMENTS and COMMUNICATIONS pertaining to YOUR trip to the "emergency room," as referenced in paragraph 13 of YOUR DECLARATION.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request to the extent it calls for confidential, personal, business, financial, medical or other proprietary information protected by law, including information that may be protected by the physician-patient privilege and/or the Privacy Rule of the Health Insurance Portability and Accountability Act of 1996 ("HIPPA"). Plaintiff further objects on the grounds that this Request calls for a medical and/or legal conclusion.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request and that refer or relate to the claims and defenses in this case, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

45. All DOCUMENTS and COMMUNICATIONS pertaining to YOUR travel in or from "Los Angeles, California the following day, May 22 [2016] for rehearsals on the east coast," as described in paragraph 22 of YOUR DECLARATION.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or

protection. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

46. All DOCUMENTS and COMMUNICATIONS pertaining to YOUR contention that "Ms. Heard [was] scheming in an email discussion with her lawyer Marty Singer (also, oddly, my lawyer in my divorce from Ms. Heard) to suborn the perjury of her former assistant Kate James to wiggle out of her criminal dog smuggling case," as described in paragraph 40 of YOUR DECLARATION.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request to the extent it seeks documents and communications already in the possession of Defendant, and for which the burden of production on Defendant is less than that of Plaintiff.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

47. All DOCUMENTS and COMMUNICATIONS pertaining to YOUR contention that "the story that Savannah was merely her 'friend' was a lie Ms. Heard, an 'immigration activist,' fraudulently wrote to Homeland Security to get what she wanted; Ms. Heard's assistant Savannah McMillen was illegally working in America, for Ms. Heard, as a simple Google search or paycheck in my possession would reveal," as referenced in paragraph 40 of YOUR DECLARATION.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

48. All DOCUMENTS obtained by way of subpoena, threat of subpoena, and/or voluntarily in relation to this litigation.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as premature, and expressly reserves his ability to supplement his response to this Request. Plaintiff further objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request in accordance with a schedule to be agreed upon by the parties and entered by the Court. For the avoidance of doubt, Plaintiff does not intend to produce any documents in response to this Request at this time.

Dated: September 3, 2019

Respectfully submitted,

[redacted]
Benjamin G. Chew (VSB #29113)
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Camille M. Vasquez (*pro hac vice application pending*)
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Counsel for Plaintiff John C. Depp, II

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of September, 2019, I caused a copy of the foregoing document to be served by email and first class mail pursuant to Rule 1:12 of the Supreme Court of Virginia to the following:

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